## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

DANIEL SCHULZ,	)	
Plaintiff,	)	05 C 3133
v.	) ) )	Judge Leinenweber Mag. Judge Mason
OXFORD MANAGEMENT	)	
SERVICES, INC.,	)	Jury Demanded
•	)	•
Defendant.	)	

### NOTICE OF FILING

TO: John T. Shriver
Richard P. Darke
Duane Morris, LLP
227 W. Monroe St., Ste. 3400
Chicago, IL 60606
312-499-6701 (FAX)

FILED

JUL - 6 2005

MICHAEL W. DOBBINS CLERK, U. S. DISTRICT COURT

PLEASE TAKE NOTICE that on July 6, 2005, we have filed the following with the Clerk of the United States District Court for the Northern District of Illinois the following document: ACCEPTANCE OF RULE 68 OFFER OF JUDGMENT, a copy of which is attached and hereby served upon you.

Alexander H. Burke

Daniel A. Edelman
Cathleen M. Combs
James O. Latturner
Alexander H. Burke
EDELMAN, COMBS, LATTURNER & GOODWIN, LLC
120 S. LaSalle Street, 18<sup>th</sup> floor
Chicago, Illinois 60603
(312) 739-4200
(312) 419-0379 (FAX)

# **CERTIFICATE OF SERVICE**

I, Alexander H. Burke, certify that on July 6, 2005, I caused a true and accurate copy of this document and the document referred to herein to be served via United States Mail and facsimile upon the party listed above.

Alexander H. Burke

#### IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

) 05 C 3133	EILED
<ul><li>Judge Leinenweber</li><li>Mag. Judge Mason</li></ul>	JUL - 6 2005
) Jury Demanded	MICHAEL W. DOBBING CLERK, U. S. DISTRICT COURT
	) ) Judge Leinenweber ) Mag. Judge Mason )

#### ACCEPTANCE OF RULE 68 OFFER OF JUDGMENT

- 1. This is an individual Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq. ("FDCPA") case. In the complaint, plaintiff seeks \$1,000 in statutory damages, plus attorney' fees and costs relating to alleged against unlawful credit and collection practices engaged in by defendant Oxford Management Services, Inc. ("OMS").
- 2. On June 29, 2005, defendant's attorney sent plaintiff the Rule 68 offer of judgment attached as Exhibit A. The offer of judgment is for "the sum of \$1,000 in addition to all reasonable attorneys' fees and costs as determined by the court."
  - 3. Plaintiff hereby accepts the judgment as offered.

Respectfully submitted,

Alexander H. Burke

Daniel A. Edelman
Cathleen M. Combs
James O. Latturner
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EDELMAN, COMBS, LATTURNER
& GOODWIN, L.L.C.
120 S. LaSalle Street, 18th Floor
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# **EXHIBIT A**

## Duane Morris\*

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ROBERT J. NAHOUM DIRECT DIAL: 212.692.1086 E-MAIL: rjnahoum@duanemorris.com

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June 29, 2005

#### **VIA EXPRESS MAIL AND FACSIMILE**

David A. Edelman Edelman, Combs, Latturner & Goodwin, LLC 120 South LaSalle Street Chicago, Illinois 60603

Re: Daniel Schulz v. Oxford Management Services, Inc. Docket No.: 05C 3133

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Dear Mr. Edelman:

Please be advised that we are counsel to Oxford Management Services, Inc. ("Oxford" or "Defendant"). Defendant hereby offers to settle all of Plaintiff's claims associated with this matter for the sum of \$1,000.00 in addition to all reasonable attorneys' fees and costs as determined by the court.

This offer of settlement is made in accordance with Rule 68 of the Federal Rules of Civil Procedure and consequently will expire ten (10) days from the date of this mailing.

This letter is for settlement purposes only and may not be used for any other purposes. This letter is further written without prejudice to any of our client's rights or remedies; all of which are expressly reserved.

Yours truly,

ROBERT J. NAHOUM

RJN/gmd